

EMERY CELLI BRINCKERHOFF ABADY WARD & MAAZEL LLP

ATTORNEYS AT LAW
600 FIFTH AVENUE AT ROCKEFELLER CENTER
10th FLOOR
NEW YORK, NEW YORK 10020

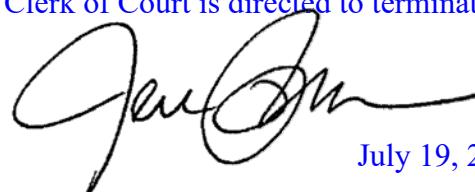
TEL: (212) 763-5000
FAX: (212) 763-5001
www.ecbawm.com

July 19, 2022

By ECF

Hon. Jesse M. Furman
United States District Judge
40 Centre Street, Room 2202
New York, New York 10007

The motion to seal is granted temporarily. The Court will assess whether to keep the materials at issue sealed or redacted when deciding the underlying motion. The Clerk of Court is directed to terminate ECF No. 490. SO ORDERED.



July 19, 2022

Re: Accent Delight, et al. v. Sotheby's and Sotheby's, Inc., No. 18-CV-9011

Dear Judge Furman:

Plaintiffs request permission, pursuant to Section 7(c)(iii) of Your Honor's Individual Rules and Practices in Civil Cases, to file a redacted version of Plaintiffs' July 19, 2022 letter motion to strike the Bouvier deposition transcript and written answers. Plaintiffs also request permission to file slip sheets in lieu of Exhibits A and B to the Declaration of Daniel J. Kornstein, dated July 19, 2022 ("Kornstein Decl."), which accompanies the letter motion. Plaintiffs will file under seal an unredacted version of each document contemporaneously with the filing of this letter.

Plaintiffs seek leave to file these documents under seal and/or in redacted form because Swiss law requires that they remain confidential. The deposition of Yves Bouvier was conducted in Switzerland on January 25 and 26, 2022, pursuant to the letter of request to obtain evidence from Mr. Bouvier issued by this Court. Under Article 54(3) of the Swiss Civil Code of Procedure, Swiss judges may, in their discretion, order that proceedings, including deposition hearings, be held completely or partially *in camera*. The Swiss judge who presided over Mr. Bouvier's deposition ordered that it be conducted entirely in a closed session. *See* Kornstein Decl., Ex. A at 334:5, 334:23-26. Accordingly, both the transcript of this deposition, Kornstein Decl., Ex. A, and the written answers submitted by Mr. Bouvier in connection with this deposition, Kornstein Decl., Ex. B, must remain confidential.

To give effect to the Swiss judge's order, Plaintiffs seek permission to file the entirety of Exhibits A and B to the Kornstein Declaration under seal and to file on the public docket a version of their letter motion redacting quoted portions of these exhibits.

Respectfully,
/s/
Daniel J. Kornstein

c. All counsel of record (*via ECF*)